California Regional Water Quality Control Board, Central Valley Region

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Date: August 19, 1997

To: Rick Woodard

Fax: 654-9780

Re: Comments on Component Report, August 1997 Draft

From: Leslie Grober

Thank-you for the opportunity to comment on the CALFED Water Quality Program Component Report. I have the following general comments/ critiques of the report:

1- Sources of information (p.3-12...):
Include the Califronia Regional Water Quality Control Board, Central Valley Region (CRWQCB,CVR) program of water quality monitoring for the lower San Joaquin River and the Grassland Area of western Merced County. Water quality samples have been collected from agricultural drains, SJR, and SJR tributary sites, and analyzed for EC, boron, selenium, temperature, pH, molybdenum, copper, chromium, lead, nickel, and zinc from 1985 through the present.

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2- Table 3.4:
See page 3 and 4 of this FAX for CRWQCB,CVR water quality objectives for boron and other trace elements. This infromation (Table III-1) is from the Water Quality Control Plan for the CRWQCB,CVR, 3rd ed., 1994 as revised in 1997.

EC objectives for SJR near Vernalis (Airport Way Bridge) can be obtained from the SWRCB May, 1995 Water Quality Control Plan.

3- Section 4:
I understand that information in this section is currently in rough form but in the final report, it's very important that information be accurate. An expanded discussion of the basin boundaries considered for the load calculation would be helpful along with how loads are attributed to a particular source. This information would help to explain, for example, loads presented for TDS in the San Joaquin Basin. 2,170,000 thousand pounds of salt per year are attributed to agriculture and only 722,500 are emitted from the basin. Does the 2,170,000 figure represent new salts mobilized, or all salts estimated to be discharged from agricultural sources (including imported salts). Does the value include only salts that reach a surface water body (the SJR?). I understand that you are using two different approaches and that the numbers are not directly comparable. I also appreciate the difficulty of assembling valid data to produce such numbers, but without further explanation, any numbers presented will be of little value. Specifically, with regard to loads presented for TDS: 722,500 thousand pounds of salt emitted from the San Joaquin Basin seems very low. My rough estimates suggest that the mean annual discharge of salt from the SJR (near Vernalis) is more on the order of 1,500,000 thousand pounds per year. Selenium emissions of 2,000 pounds per year also seems extremely low. As previously mentioned the Regional Board has a large database of selenium concentration data for the SJR Basin.

The discussion of background loads needs to be expanded. If, as you say, the concentration of some 'metals, trace elements, salts...' occur in low concentrations, uninfluenced by human activities, is it appropriate to attribute such loads to human activities? Loads attributed to such activities would be of limited value because the background component is unknown. Further, if such load numbers are presented, a disclaimer that addresses background loads should appear in the tables themselves so that the numbers are not used out of context.

4- Figure 5-1 (also figure E-3):
What is the difference between TDS and Salt as listed under other parameters of concern?

5- Section 7:
I contributed to extensive comments on this section that were submitted to you by Gail Louis of EPA. I understand that, to date, not all comments have been addressed in this draft.

Please call me at 255-3015 if you have any questions regarding these comments. Jerrold Bruns of our Standards, Policies, and Special Studies unit will also be providing comments on the draft component report.

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